Before the FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of)	
)	WT Docket No. 01-309
Section 68.4(a) of the Commission's Rules)	
Governing Hearing Aid-Compatible Telephones)	DA 04-567

To: The Commission

COMMENTS ON PETITIONS FOR RECONSIDERATION

The International Hearing Society ("IHS" or "the Society") respectfully submits these comments in support of the Federal Communication Commission's August 14, 2003 Report and Order relating to hearing aid compatible telephones. Founded in 1951, the Society is a professional association of hearing aid dispensers. Our members across the country are dedicated to maximizing access to essential hearing health services so that an increasing number of Americans can enjoy the proven benefits of amplification.

IHS supports the August 14, 2003 Report and Order on hearing aid compatible telephones because it will increase the communication capabilities of those hearing aid wearers who also use cellular telephones. IHS urges that the petitions for reconsideration of the October 14, 2003 Report and Order be squarely rejected.

IHS endorses the position of the Hearing Industries Association ("HIA") in support of the Report and Order. HIA's members, who manufacture hearing aids, have worked tirelessly to achieve high hearing aid immunity levels for cell phone interference. Further, the American National Standards Institute (ANSI) Standard Number C63.19 is an appropriate measurement tool for compatibility of cellular telephones with hearing aids because it is repeatable, predictable and accurate. The August 14, 2003 Report and Order rightly adopts this standard as an established technical standard for wireless phone compatibility with hearing aids.

IHS supports the August 14, 2003 Report and Order and urges that efforts to force its reconsideration be rejected. Please do not hesitate to contact me or our Washington Counsel, Karen Sealander of McDermott, Will & Emery, at 202.756.8024 or ksealander@mwe.com.

Respectfully submitted,

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IHS President

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